



Gulfco - Recommendations on GNL
Kevin Shade to: Anne Foster, Gary Miller
Cc: Barbara Nann

05/18/2011 12:04 PM

Anne and Gary,

(Barbara - I included you in case you catch something)

I have reviewed the PRP Group's nexis report and the contractor's work to an extent (the latter attached below). I developed a spreadsheet with the names of PRPs that evidence exists they arranged for disposal at the Site. The nexis report had many PRPs that had unknown material, so they are left off this chart.

I recommend that we issue GNL to

American Commercial Lines
Ashland Oil
BASF
Blessy Marine
Kirby Corporation

There are two PRPs that show having paint waste/zinc at the Site from redoing barges. I'm still a bit hesitant on zinc. Correct me Gary, but didn't we have zinc levels in background? What's everyone's take?

If we are to issue GNL to any of the parties, I recommend that the following attachments be included:

1. PRP Group's Nexis Report
2. All EPA redacted records of the barge cleaning invoices
3. Amended UAO
4. Final Approved RI Report (w/ validated data)
5. Removal Report
6. List of UAO PRPs and their counsel

The GNL would use our model, but include language encouraging them to contact the current UAO Group (I guess Moriss would be the prime contact maybe?).

My chart:



PRP List - GRP Nexis Report.xlsx

Contractor developed chart:



casales index for contaminant search_rev_Filters_4-20-09.xls

Let me know of your thoughts/concerns/suggestions.

Kevin

Kevin A. Shade
US EPA Region 6



640831

Superfund Enforcement Officer
Phone: 214.665.2708
Fax: 214.665.6660

Confidentiality Warning: This e-mail may be privileged and/or confidential, and the sender does not waive any related rights and obligations. It is intended for the named recipient(s) only. Any distribution, use or copying of this e-mail or the information it contains by other than an intended recipient is unauthorized. If you received this e-mail in error, please advise me (by return e-mail or otherwise) immediately and do not duplicate it or disclose its contents to anyone.

10 PPTs

Fish Engineering ?
Technip

104(e)

Kirby - New
~~De Pont~~
~~Genova~~
~~Tagram~~ } Same

(L) Ashland Oil
(TPT was director)

? F&S Contractor
? weather subpart

OK Stolte Nelson (Maryland Marine ?)

LeeVack Corp
Samedan (Noble Energy)
↳ NO → Connect